

To: Patel, Manojkumar[patel.manojkumar@epa.gov]
From: richard@janard.net
Sent: Thur 12/22/2016 7:44:21 PM
Subject: Mid-America Steel Drum Co, Oak Creek, WI
[removed.txt](#)

Hi Manoj, I am working on the requests you made for information from the Mid America Steel Drum Co facility located in Oak Creek, WI. You had previously met with Fred Krablean from my company and I am now taking over this project. It is my understanding that you wanted to see how we determined compliance with the VOC limits and the 2.6 lbs of HAPs per lbs of Solids. I have certs (certifications) from the paint manufacturer demonstrating those limits are being met. They are Certifications of Analysis based on the manufacturer's formula for each paint material. Will those be acceptable to you? I have certs here for every paint used since 2012.

Also I called a couple of weeks ago and left a message for you to let you know that on the spread sheets from the company and on air emissions reports we had been reporting ethylene glycol as a HAP when, in fact, the ingredient in the paints used at Mid America Steel Drum Co do not have ethylene glycol in them. The component in their paints is actually ethylene glycol butyl ether (EGBE) more commonly known as 2-butoxyethanol CAS 111-76-2 which is NOT listed as a HAP and is specifically eliminated from the ethylene glycol compounds.

So that I can fulfill your request and my obligations to Mid America Steel Drum Co, please respond and let me know if these certs will serve your needs or exactly what it is you need.

Thank you,

Richard Lyle, President

JANARD, INC.

P.O. Box 2011

Brookfield, WI 53008-2011

Ph: (262) 792-1150

FAX: (262) 792-1152

Cell: (414) 303-4712

